

**LAW OFFICE OF AMY JANE AGNEW, P.C.**

Honorable Philip M. Halpern  
The Hon. Charles Brieant Jr. Federal  
Building and U.S. Courthouse  
300 Quarropas Street, Courtroom 520  
White Plains, NY 10601

**VIA ECF**

Re: *Crichlow v. Sipple, et al.*, 18-cv-3222

Dear Judge Halpern:

Our office represents the Plaintiff in this matter. I write to respectfully request an additional thirty days extension to file the parties' settlement papers. I do apologize for the delay, but it recently came to our attention that Mr. Crichlow has a parole hearing later this month and may be released in the near future. We also represent Mr. Crichlow in a case regarding his medical care while in custody (which is how we came to represent him in his suite of pro se cases). Because Mr. Crichlow is disabled and will be heavily dependent on public benefits upon release, we are considering establishing a Supplemental Needs Trust for him to ensure his eligibility for benefits even if he receives settlements in the two pending cases. I do not anticipate any settlement monies being sufficient to maintain Mr. Crichlow, but nonetheless his receipt could jeopardize his ability to receive appropriate medical care, housing, or other essential support. Defendants have graciously agreed to the extension so I can explore a Trustee with our client or find one for him. The Trust paperwork is quite easy (and we have done it in several cases) but will take a few more weeks. Once established, the State will pay settlement monies directly into the Trust. I do truly appreciate the Court's courtesy while we put our client in the best spot possible for a successful transition back to society. Accordingly, the parties respectfully request an extension until August 9, 2024 to file the settlement paperwork.

Application granted. The time for the parties to move to reopen this case is extended to August 9, 2024.

**SO ORDERED.**



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
July 9, 2024

Very truly yours,

LAW OFFICE OF AMY JANE AGNEW, P.C.

/s/ **AJ Agnew**

Amy Jane Agnew, Esq.